



MODINE

December 10, 1991

Diane Huffman
Compliance Section, RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

RECEIVED
DEC 16 1991
RCOM SECTION

REF: EPA I.D. #MOD062439351

Dear Ms. Huffman:

The following information and attached drawing is being submitted as a result of your request dated November 14, 1991, for information pursuant to completion of a RCRA facility assessment.

According to the definition for Solid Waste Management Units (SWMU) we have identified four units. The requested information is attached to this letter. If you need additional information contact me at 314-346-5696.

Sincerely,

Gaylord S. Olson
Plant Manager

GS0:evd

Attachments



R00015864

RCRA Records Center

Unit one

Description of SWMU

Unit one on the drawing was a drum storage area. The storage area was located about 80 feet from the plant on a gravel base.

Whether there is/was secondary containment

This area was used between 1980 and 1983 without secondary containment. Plastic drum covers were used to prevent contamination or deterioration caused by rain water.

Current contents of SWMU.

Waste has not been stored there since 1983. The area was used to store up to 45 drums of liquid and solid waste prior to 1983.

Material of construction.

Storage area was a compacted base rock clay mixture on top of clay fill.

Date of installation.

1980 when original part A application was filed.

Historical content.

F001 waste trichloroethylene still bottoms, D001 waste paint filters and liquid

Historical use.

Non hazardous waste oil

Date of closure.

October 17, 1990.

Closure procedures.

See attached closure plan.

Date and quantity of any releases of hazardous waste.

No releases other than oil residue from empty drums are known to have happened at this location. Residue from 40 empty drums could have amounted to 10 - 15 gallons of oil.

Waste and waste constituents.

Corrective measures or response to releases(s).

Atmospheric evaporation of volatile compounds if present and grading of storage area was done to correct for oil residue in the gravel.

Unit Two

Description of SWMU

Unit two on the drawing was a tank and drum storage area. The storage area was located about 10 feet from the plant on a concrete pad. The drum storage area was fenced for security.

Whether there is/was secondary containment

This area was used between 1983 and 1985 with secondary containment. The area had no roof so Plastic drum covers were used to prevent contamination or deterioration caused by rain water. The secondary containment consisted of an 8 inch thick concrete wall with enough capacity to contain a leak from the 1000 gallon waste oil tank or a 5300 gallon Trichloroethylene storage tank.

Current contents of SWMU.

The concrete slab and the secondary containment wall were removed to facilitate the construction of the new wastewater pretreatment and chemical storage area. No waste has been stored in this area since 1985.

Material of construction.

Storage area and secondary containment were constructed of steel reinforced concrete.

Date of installation.

1983 when original part A application was revised.

Historical content.

D098 waste oil, F001 waste trichloroethylene still bottoms, F003 paint waste containing xylene and D001 waste paint filters, F006 pretreatment waste.

Historical use.

None

Date of closure.

October 17, 1990.

Closure procedures.

See attached closure plan.

Date and quantity of any releases of hazardous waste.

No releases from this area are known. Pump seal leakage or tank overflow was contained by the secondary containment.

Waste and waste constituents.

Corrective measures or response to releases(s).

No releases are known. Solvent waste and contained spills were shipped to Safety-Kleen for proper treatment and disposal.

Unit Three

Description of SWMU

Unit three on the drawing is a tank and drum storage area. The storage area is located at the north end of the pretreatment room. The room has two hour rated fire walls and an insulated roof. The seamless concrete floor is coated with a chemical resistant coating.

Whether there is/was secondary containment

The reinforced concrete floor was poured with curbs to form a leak tight containment area. No cracks had developed or had to be repaired prior to the application of the chemical resistant coating. The curbed area was designed to hold 110% of the largest tank in the room or 5830 gallons.

Current contents of SWMU.

D098 waste oil, F001 waste 1,1,1-trichloroethane still bottoms, F003 paint waste containing xylene, F006 pretreatment waste.

Material of construction.

The storage room walls are constructed with 8" and 12 " cinder blocks and insulated with vermiculite fill. The roof is 24 gauge galvanized steel with 6 " fiberglass insulation. The seamless concrete floor is 6" thick and coated with a chemical resistant epoxy coating.

Date of installation.

1985.

Historical content.

Paint waste solids (Used filters had been stored in the area). The filters were D001 because of flammability.

Historical use.

Besides the storage of hazardous waste, other process chemicals are stored in this room.

Date of closure.

October 17, 1990.

Closure procedures.

See attached closure plan.

Date and quantity of any releases of hazardous waste.

No releases from this area have taken place. All spills have been contained within the containment area.

Waste and waste constituents.

Corrective measures or response to releases(s).

No releases have taken place.

Unit Four

Description of SWMU

Unit four on the drawing is a tank and drum storage area. The storage area is located at the north end of the pretreatment room. The room has two hour rated fire walls and an insulated roof. The seamless concrete floor is coated with a chemical resistant coating.

Whether there is/was secondary containment

The reinforced concrete floor was poured with curbs to form a leak tight containment area. No cracks had developed or had to be repaired prior to the application of the chemical resistant coating. The curbed area was designed to hold 110% of the largest tank in the room or 5830 gallons.

Current contents of SWMU.

D098 waste oil, F001 waste 1,1,1-trichloroethane still bottoms, F003 paint waste containing xylene, F006 pretreatment waste, F009 waste acid containing copper.

Material of construction.

The storage room walls are constructed with 8" and 12 " cinder blocks and insulated with vermiculite fill. The roof is 24 gauge galvanized steel with 6 " fiberglass insulation. The seamless concrete floor is 6" thick and coated with a chemical resistant epoxy coating.

Date of installation.
1985.

Historical content.

Paint waste solids (Used filters had been stored in the area). The filters were D001 because of flammability.

Historical use.

Besides the storage of hazardous waste, other process chemicals are stored in this room.

Date of closure.
October 17, 1990.

Closure procedures.
See attached closure plan.

Date and quantity of any releases of hazardous waste.

No releases from this area have taken place. All spills have been contained within the containment area.

Waste and waste constituents.

Corrective measures or response to releases(s).
No releases have taken place.

Sundstrand Tubular Products Inc.,
Box 636
Camdenton, Mo. 65020

September 4, 1990

Ms. Jan Skouby
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Dear Jan:

Attached is a copy of our request for closure plan approval dated November 7, 1988. The basic plan has not changed, but I have revised the plan to update our current situation. Financial assurances have been increased to \$15,000 since the plan was originally submitted.

Per our telephone conversation, and notes from my file on closure we will be required to do the following:

1. Submit a new letter of intent to close which is being done with this letter.
2. The state of Missouri will publish our intent to close the storage facility, which allows a 30 day period for public comments or requests for public hearings.
3. Sundstrand will retain the services of a registered Engineer to certify that the facility is clean and properly closed according to EPA regulations CFR 265.
3. 60 days after closure and receipt of the closure certification, the State of Missouri will issue a release from the requirement for financial assurances.

Sincerely Yours,



Don Mans
Plant Engineer

CLOSURE PLAN

STORAGE FACILITY CONDITIONS

General Information

- 1) The storage facility is a 47' X 75' Block building with a 1/4" thick impervious chemical resistant coating over a seamless concrete floor. The storage facility is contained in a separately diked part of the room, 47' X 41'.
- 2) F001 Trichloroethylene was stored in a 1000 gallon steel storage tank and 55 gallon drums. The use of trichloroethylene was discontinued in December 1989. All waste was shipped out of the facility in January 1990. 1,1,1-trichloroethane is now being used and the F001 waste is stored in 55 gallon drums. D001 paint waste is stored in 55 gallon drums. F006 pretreatment waste is stored in 55 gallon drums.
- 3) The maximum inventory of wastes in storage and in treatment at any time during the life of this facility is as follows:

F001 - The spent trichloroethylene used in degreasing and sludges from the recovery of trichloroethylene in degreasing operations. 61,360 lbs.

F006 - Wastewater treatment sludges from electroplating operations. 58,388 lbs.

D001 - Waste from Industrial Painting. 5,250 lbs.

Closure Schedule

Sundstrand Tubular Products plans to complete all closure activities between September 24, 1990 and October 12, 1990. Completing closure during this time will allow an orderly transition from T.S.D. Status to 90 day storage Generator Status.

FACILITY DECONTAMINATION

Steps required to decontaminate facility equipment during closure are as follows:

The trichloroethylene waste storage tank is to be thoroughly cleaned of all oils, trichloroethylene, sludges, etc. No odor or residue is to be left in the equipment. All trichloroethylene waste and hazardous residue from decontamination procedure is to be disposed of by shipping to Safety-Kleen for proper treatment and disposal. The storage tank will be inspected and certified safe for continued use after closure.

All wastewater pretreatment waste is to be removed from the dryer and put into drums. The drums are to be shipped to

Chemical Waste Management in Fort Wayne, Indiana to be landfilled.

All liquid paint waste will be be shipped to Safety Kleen in Clarksville, Mo. to be incinerated in the Fuels Blending Program.

The floor will be decontaminated and inspected for cracks. Decontamination will include washing, steam cleaning and collecting residue with a wet vacuum. The amount of residue is not expected to exceed (2) 55 gallon drums. This waste will be properly labeled and shipped to Safety Kleen for treatment and disposal.

The environmental coordinator will monitor all closure activities to ensure conformance with our plan.

Unless Missouri has a Closure Certification Statement form of its own we propose to use the attached form which is the same as the one used by the Illinois Environmental Protection Agency.

SUNDSTRAND TUBULAR PRODUCTS

ESTIMATED COST OF CLOSURE

DESCRIPTION	LABOR	MATERIAL
Salvage 1000 gallons waste oil		\$ 550
Clean 1000 gallon waste oil tank (16 hours)	\$ 240	
Clean Facility (32 hours)	\$ 480	
Dispose of 40 drums hazardous waste (16 hours)	\$ 240	\$ 5,200
Dispose of 2 drums clean-up waste (2 hours)	\$ 30	\$ 240
Engineering Fee		\$ 400
 TOTAL:	 \$ 990.00	 \$6,060.00
 TOTAL LABOR AND MATERIAL	 \$7,450.00	

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. At least one copy of the certification must contain the original signatures.

CLOSURE CERTIFICATION STATEMENT

The hazardous waste management units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

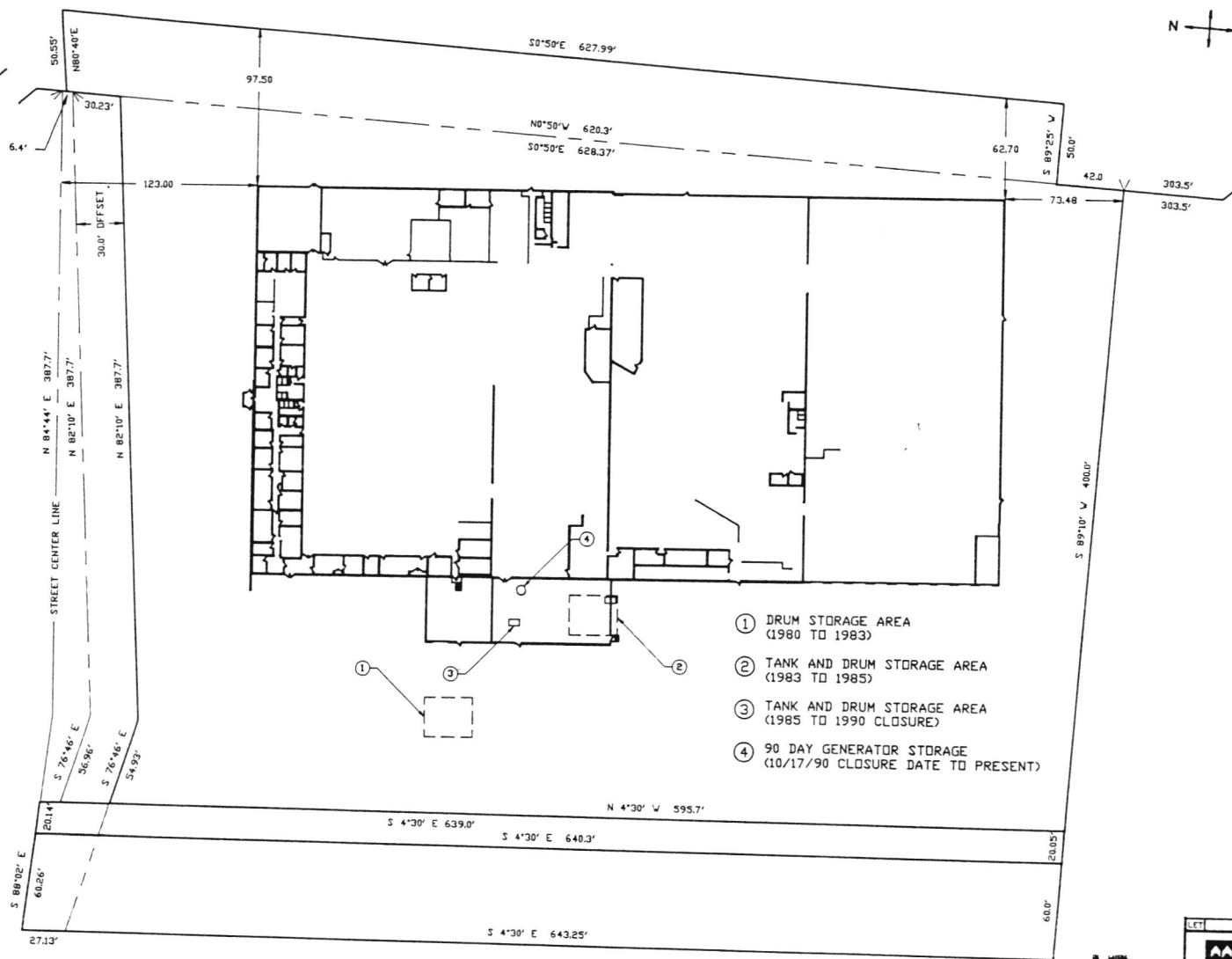
Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E.
and Registration Number

Date



LET	BY	DATE
MODINE HEAT TREATING, INC. CAMBERTON, MISSOURI 63006		
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